

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION

PRESIDENT DONALD J. TRUMP,  
an individual, and REPRESENTATIVE  
RONNY JACKSON, an individual

Plaintiffs,

v.

PARAMOUNT GLOBAL d/b/a  
PARAMOUNT, a Delaware  
corporation, CBS BROADCASTING  
INC., a New York corporation, and CBS  
INTERACTIVE, INC., a Delaware  
corporation,

Defendants.

Case 2:24-CV-00236-Z

**CONSENT MOTION FOR AN EXTENSION OF TIME TO RESPOND TO  
DEFENDANTS' MOTION TO DISMISS FOR LACK OF PERSONAL  
JURISDICTION AND IMPROPER VENUE OR, IN THE ALTERNATIVE,  
TO TRANSFER AND DEFENDANTS' MOTION TO DISMISS  
THE COMPLAINT FOR LACK OF SUBJECT MATTER JURISDICTION AND  
FAILURE TO STATE A CLAIM**

Defendants Paramount Global d/b/a Paramount, CBS Broadcasting Inc. and CBS Interactive Inc., (together "Defendants") have filed (1) a "Motion to Dismiss for Lack of Personal Jurisdiction and Improper Venue or, In the Alternative, to Transfer" (Dkt. 49), and (2) a "Motion to Dismiss the Complaint for Lack of Subject Matter, Jurisdiction and Failure to State a Claim" (Dkt. 51) (the "Motions").

The Parties respectfully request, per agreement of the Parties, that the Court extend until **April 28, 2025** Plaintiffs' deadline to file an opposition to the Motions.

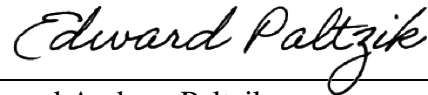


The Parties have further agreed that, if the extension is granted, Defendants will have until **May 28, 2025** to file any reply papers.

Plaintiffs' counsel has conferred with counsel for Defendants, and all Parties have consented to this motion in writing.

Respectfully submitted,

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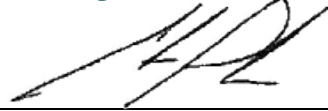


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Daniel Z. Epstein  
(*applying for admission pro hac vice*)



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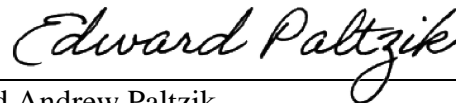
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Chris D. Parker

*Counsel for Plaintiffs, President Donald J. Trump  
and Representative Ronny Jackson*

**CERTIFICATE OF CONFERENCE**

I certify that on the 11<sup>th</sup> day of March, 2025 I conferred with attorney Elizabeth McNamara, counsel for Defendants. Ms. McNamara stated that she is in agreement with this Motion.

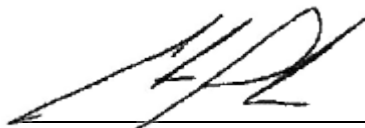


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Edward Andrew Paltzik

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing document was served pursuant to the Federal Rules of Civil Procedure on the 11<sup>th</sup> day of March, 2025, via the Northern District of Texas's electronic filing notification system.



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Chris D. Parker